

## UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Andrew Wolf

Case No. 21-1530-M

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 10, 2021 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

18 USC 2252(a)(2)

Receipt and attempted receipt of child pornography

18 USC 2252(a)(2)

Distribution and attempted distribution of child pornography

18 USC 2(b)

Willfully causing the distribution of child pornography

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

/s/ Daron Schreier

*Complainant's signature*

Daron Schreier, FBI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 10/07/2021

/s/ Lynne A. Sitarski

*Judge's signature*City and state: Philadelphia, Pennsylvania

Honorable Lynne A. Sitarski, USMJ

*Printed name and title*

Kate Barkman, Clerk of Court  
 U.S. District Court, Eastern District of PA

**AFFIDAVIT**

I, Daron Schreier, a Special Agent with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I am a Special Agent with the FBI and have been since January of 2006. Since August of 2006, I have been assigned to the Philadelphia Division where I have been a member of the Joint Terrorism Task Force, the Cyber squad, and most recently the Violent Crimes Against Children squad. I have received training from the FBI in the fields of international terrorism, counterintelligence, computer crime, and the enforcement of federal child pornography laws.

2. This affidavit is made in support of a criminal complaint charging ANDREW WOLF, with receipt of child pornography, in violation of 18 U.S.C. § 2252(a)(2), and distribution and willfully causing the distribution of child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and 2(b), and attempting to do so, on or about July 10, 2021, as outlined below.

3. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

4. The statements in this Affidavit are based on my investigation and other law enforcement officers' investigation of this matter. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause in support of the attached criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause for the arrest of ANDREW WOLF.

### **BACKGROUND OF THE INVESTIGATION**

5. The National Center for Missing and Exploited Children (hereinafter “NCMEC”) receives complaints via their CyberTipline from Internet Service Providers (“ISPs”), Electronic Service Providers (“ESPs”), and others. These CyberTipline reports are reviewed by a NCMEC analyst and forwarded to Law Enforcement for further investigation on the information provided in the CyberTipline report. ISPs, ESPs, and others may physically view a picture, video, or any other content that they would then report to NCMEC.

6. On July 12, 2021, Dropbox Inc filed a CyberTipline report that the account with Dropbox user ID 34087520 and email address [awolf@sch.org](mailto:awolf@sch.org) uploaded one file depicting suspected child pornography to the user’s account. Personnel from Dropbox reviewed the file prior to submitting the report. Your Affiant reviewed the file, and in your Affiant’s opinion, the file depicts child pornography within the meaning of Title 18 U.S.C. § 2256.

7. The video file was uploaded to Dropbox on June 29, 2021 at 21:28:50 UTC. The video is approximately 7 minutes and 12 seconds in length and depicts two boys, approximately 10 to 14 years of age, naked on a bed, masturbating each other and then penetrating each other anally with their fingers and penises.

8. In addition to the file described above, Dropbox provided other information pertaining to the account with user ID 34087520 and email address [awolf@sch.org](mailto:awolf@sch.org). Dropbox records show that email address [awolf@sch.org](mailto:awolf@sch.org) was verified by the user on May 20, 2012, meaning the user clicked on a link sent to that email address by Dropbox. Dropbox records indicated the user provided his/her name as ANDREW WOLF.

9. Dropbox provided two IP logins for the account:

- a. 100.34.101.67 on November 16, 2020 at 22:37:02 UTC, and
- b. 38.66.66.130 on November 16, 2020 at 12:36:44 UTC.

10. Per the American Registry for Internet Numbers ([www.arin.net](http://www.arin.net)), IP address 100.34.101.67 resolves to Verizon. In response to an Administrative Subpoena, Verizon identified the subscriber of IP address 100.34.101. 67 between July 23, 2019 and June 8, 2021 as ANDREW WOLF, at the same residence in Philadelphia, Pennsylvania 19128 where ANDREW WOLF's driver's license issued on May 16, 2020 is registered.

11. Per the American Registry for Internet Numbers ([www.arin.net](http://www.arin.net)), IP address 38.66.66.130 resolves to Cogent. A query of the IP address on Cogent's website ([ecogent.cogentco.com/legal](http://ecogent.cogentco.com/legal)) found that IP address 38.66.66.130 is assigned to the Springside Chestnut Hill Academy, Philadelphia, Pennsylvania 19118 where, according to the school's website, ANDREW WOLF is employed as a Mathematics teacher.

12. A federal search warrant was authorized and executed for the Dropbox account with user ID 34087520 and email address [awolf@sch.org](mailto:awolf@sch.org). The account was found to contain approximately 190,000 visually unique image and video files still in the account, along with approximately 800 visually unique image and video files that had been deleted from the account but maintained by Dropbox. Amongst the approximately 190,000 visually unique image and video files still in the account, your Affiant found multiple thousand files that depicted an individual that appeared identical to the driver's license photo of ANDREW WOLF, date of birth June xx, 1980.

13. Amongst the approximately 800 deleted files provided by Dropbox pursuant to

the search warrant, your Affiant found a file that was visually identical to the file that was reported by Dropbox in the NCMEC Cybertip described above.

14. Your Affiant also found three files depicting sexually explicit images or videos of unidentified apparent minors, further described as follows:

- a. 1624563044313782\_IMG\_2115.JPG depicts a naked minor boy, approximately 10 to 14 years old, from the knees to the top of his head, standing in what appears to be a bedroom with a white door and blue wall. The boy is facing the camera and his genitals are visible.
- b. 1625057376044622\_IMG\_2268.mp4 is approximately 25 seconds in length and depicts a minor boy, approximately 10 to 14 years old, sitting in his underwear on what appears to be the bottom bunk of a bunk bed. The video depicts the boy taking off his underwear and then masturbating.
- c. 1623515549740494\_1678575185058609765.mp4 is approximately 22 minutes and 4 seconds in length and depicts a minor boy, approximately 10 to 14 years old, sitting on the floor with a bed and a yellow/beige wall in the background. The video depicts the boy masturbating.

15. Within the deleted files of the Dropbox account, your Affiant found screen recordings and screenshots of public Instagram posts and stories created by an Instagram account with a username known to your Affiant (hereinafter “the minor victim’s account”). Your Affiant reviewed these public posts and stories created by the minor victim’s account and found they depicted a minor boy, approximately 12 to 14 years old. Your Affiant also found approximately 17 screen recordings of private Instagram conversations between an unknown user (believed to

be ANDREW WOLF) and the minor victim's account. The screen recordings appeared to be of a cellphone screen and taken with a separate device. Due to the nature in which Instagram is displayed on a user's phone, neither the username nor the display name for the individual recording the conversation was visible. A review of the contents of this conversation found the unknown user appeared to have paid the minor victim \$100 for multiple sexually explicit videos (described in further detail below).

16. Eight of these screen recordings contained Exchangeable Image File Format (EXIF) data. EXIF data is a standard that defines specific information related to an image or other media captured by a digital camera. It is capable of storing such important data as camera exposure, date/time the image was captured, and even GPS location. These eight screen recordings contained the following EXIF data:

- a. Latitude/Longitude: 40.051399230957, -75.2267990112305;
- b. Device Make/Model: Apple iPad Pro;
- c. Create Dates: July 6, 2021 and July 10, 2021.

17. Your Affiant searched the latitude and longitude coordinates of 40.051399230957, -75.2267990112305 in Google Earth. The coordinates resolved to the immediate vicinity of ANDREW WOLF's residence in Philadelphia, Pennsylvania.

18. The FBI issued an Administrative Subpoena to Facebook for records pertaining to the minor victim's Instagram account and learned the User ID number and registration date of the account (June 24, 2021). A federal search warrant subsequently was authorized and executed for the minor victim's Instagram account. On September 17, 2021, Facebook provided records in response to the search warrant. Your Affiant reviewed these records and found a direct

Instagram message conversation, which occurred between the minor victim's Instagram account and an Instagram user with a User ID of 37049285075 (believed to be ANDREW WOLF). Your Affiant compared the content of this message exchange with the screen recordings recovered from the Dropbox account of [awolf@sch.org](mailto:awolf@sch.org). Your Affiant found the content captured in the screen recordings was the same content from the Instagram message exchange between the minor victim's account and Instagram User ID 37049285075.

19. A review of these Instagram messages, as well as the corresponding screen recordings recovered from the Dropbox account, reveals that between approximately June 30, 2021 and July 10, 2021, Instagram User ID 37049285075 (believed to be ANDREW WOLF) purchased or attempted to purchase at least six sexually explicit videos of the minor victim for \$100.00.

20. Excerpts from the private message conversation between Instagram User ID 37049285075 (hereinafter "awolf") and the minor victim appear below:

a. First Excerpt:

awolf: What will u send

victim: Nudes

awolf: Bet

victim: But

victim: It's 50-100

awolf: What do I get exactly for 50 and what exactly for 100

victim: K so

victim: 50 is 4 1 min vids

victim: 75 is 7 1 min vids and five pics

victim: 100 is almost 35 pics and 30 vids

awolf: Ok

awolf: What's in the vids

awolf: I'd prolly do 100 I think

victim: 50 is basically lower quality and not showing as much and 75 is...uh...decent, still doesn't show as much...like it shows a little bit of dick, a little bit of ass, but not a lot, and a hundred I show ass, asshole, dick, I cum, and I do a lot of dance, I twerk, I do everything naked [sent via Audio Message]

awolf: Nothing of u w another boy

victim: Oh yeah and I forgot to tell you, a hundred fifty I have videos of me and me putting shit up my ass, like toothbrush and shit. And for two hundred and five hundred. Two hundred is me sucking dick. And five hundred is me getting fucked by another boy [sent via Audio Message]

b. Second Excerpt:

awolf: ... my friend...

victim: Hey

awolf: Sup

awolf: You stay up all night?

awolf: You still need to send to me [smile face emoticon]

victim: Sorry busy

awolf: Ok so sometime tonight [kiss face emoticon]

awolf: Hi [minor victim's first name] I'm still waiting. Can you send please?



victim: [Transmits one video titled video-1625879654.mp4 at 1:14:13 UTC on July 10, 2021. Video is 47 seconds in length and depicts a minor boy, approximately 12 to 14 years old, standing naked in a bathroom. The boy displays his butt for the camera and dances, then masturbates. The boy appears identical to the boy depicted in the public Instagram posts and stories created by victim.]

victim: How much did u send

victim: [Transmits one video titled video-1625879688.mp4 at 1:14:47 UTC on July 10, 2021. Video is 52 seconds in length and depicts the same minor boy, naked in a bathroom. The boy displays his butt for the camera and dances, then masturbates]

victim: Sir

victim: Sir

victim: Sir

victim: Hey

victim: [Transmits one video titled video-1625879702.mp4 at 1:15:01 UTC on July 10, 2021. Video is 52 seconds in length and depicts the same minor boy, naked in a bathroom. The boy displays his butt for the camera and dances, then masturbates]

awolf: 100

victim: How much did u send

victim: [Transmits one video titled video-1625879708.mp4 at 1:15:06 UTC on July 10, 2021. Video is 47 seconds in length and depicts the same minor boy, naked in a bathroom. The boy displays his butt for the camera and dances, then masturbates]

victim: Ok

victim: [Transmits one video titled video-1625879712.mp4 at 1:15:11 UTC on July 10, 2021. Video is 49 seconds in length and depicts the same minor boy, naked in a bathroom and masturbating.]

Your Affiant found five videos in the deleted folder of the Dropbox account for [awolf@sch.org](mailto:awolf@sch.org). The content of the five videos appears visually identical to the five videos sent by the victim to Instagram User ID 37049285075.

c. Third Excerpt:

awolf: Ok well how about this then...since I sent you 100 fricking dollars...forget about the 35 pics and 30 vids and just send 1 cumming?

victim: Yeah ok

awolf: K

victim: imma send it later

victim: [Transmits video file which depicts the same minor boy described previously drinking a soda in a restaurant with the text "out to eat rn" over top]

awolf: Ok have fun sexy

awolf: U able to send it now?

victim: yeah brb

awolf: K

victim: [Transmits two videos.]

As part of the Search Warrant production, Instagram denotes the transmission of these two videos with the text "You sent an attachment," but does not include the content of the videos. Your Affiant recovered a screen recording from the Dropbox account, which captures the user recording this part of the conversation and playing the first video transmitted by the

minor victim. The screen recording is approximately 1 minute and 4 seconds and depicts a cellphone lying on a brown carpet. An adult hand is seen pressing play on the first of the two videos transmitted by the minor victim. The video that plays depicts the close-up of the genitalia of a minor boy standing in what appears to be a bathroom. The boy masturbates and then appears to ejaculate. The content of the other video is not seen in the screen recording. The screen recording, identified by the file name 1625917982192739\_IMG\_0823.mov, contains EXIF data that resolves to the immediate vicinity of ANDREW WOLF's residence in Philadelphia and was created on July 10, 2021 at 04:31:31 UTC.

awolf:	Did u make that just now?
victim:	Yeah
victim:	Why
awolf:	Just wondering
awolf:	But it was piss?
victim:	[Transmits photo depicting a boy from chest to knees wearing only yellow boxer briefs]
victim:	The second shot was lmao
awolf:	How old r u
victim:	13
awolf:	How long have u been able to cum
victim:	Barley
awolf:	Like how many months since ur first time I mean
victim:	3 maybe
awolf:	Cool

21. On October 5, 2021, United States Magistrate Judge Lynne A. Sitarski, Eastern District of Pennsylvania, authorized a search and seizure warrant for the person of ANDREW WOLF and his residence.

22. On October 7, 2021, the FBI executed this search warrant and came into contact with WOLF at his residence, where he lives alone with his 6-month-old child. WOLF agreed to speak to agents. When asked why WOLF thought the FBI might be interested in speaking to him, WOLF responded that it was likely because of his Dropbox account, which he reported recently was shutdown for violating Dropbox's terms of service related to pornography. WOLF further described that he had received some pornography that looked young from Instagram and it was uploaded to his Dropbox account. WOLF believed his Dropbox account was registered in either his school email address ([awolf@sch.org](mailto:awolf@sch.org)) or his personal g-mail email address. WOLF reported that he uses several Instagram accounts.

23. Pursuant to the terms of the search and seizure warrant, the FBI seized several electronic devices from the person of ANDREW WOLF and from his residence, including an Apple iPad and Apple iPhone. A preliminary forensic review of WOLF's iPhone indicates that WOLF currently has the Instagram application installed on his phone. His current Instagram profile picture is a photograph of a teenage girl who appears to be a minor. The minor victim's Instagram account is included as one account WOLF follows, along with several other accounts that appear to belong to minor boys.

**CONCLUSION**

24. Based on the information above, I respectfully submit that there is probable cause to believe that ANDREW WOLF committed violations of 18 U.S.C. §§ 2252(a)(2) (receipt and distribution of child pornography, and attempt to do so) and 2(b) (willfully causing the distribution of child pornography) on or about July 10, 2021. Therefore, I respectfully request that the attached form of criminal complaint be issued for the arrest of ANDREW WOLF.

/s/ Daron Schreier

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Daron Schreier  
Special Agent  
Federal Bureau of Investigation

Sworn to me this 7<sup>th</sup>  
day of October 2021.

/s/ Lynne A. Sitarski

\_\_\_\_\_  
HONORABLE LYNNE A. SITARSKI  
United States Magistrate Judge

**ATTACHMENT A**

**Count One – Receipt of Child Pornography – 18 U.S.C. § 2252(a)(2), (b)(1)**

On or about July 10, 2021, in Philadelphia, in the Eastern District of Pennsylvania, defendant ANDREW WOLF, knowingly received visual depictions, using any means and facility of interstate and foreign commerce and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including computer, the producing of which involved minors engaged in sexually explicit conduct, and the visual depictions were of such conduct, and attempted to do so.

**Count Two – Distribution and Willfully Causing the Distribution of Child Pornography – 18 U.S.C. §§ 2252(a)(2), (b)(1) and 2(b)**

On or about July 10, 2021, in Philadelphia, in the Eastern District of Pennsylvania, defendant ANDREW WOLF, knowingly distributed and willfully caused the distribution of visual depictions, using any means and facility of interstate and foreign commerce and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including computer, the producing of which involved minors engaged in sexually explicit conduct, and the visual depictions were of such conduct, and attempted to do so.